UNITED STATES DISTRICT COURT DISTRICT OF NEW HAMPSHIRE

<u>DEFENDANTS' JOINT ASSENTED-TO</u> <u>MOTION TO EXTEND REPLY DEADLINE</u>

The defendants, through their respective counsel, jointly move, with plaintiff Paul Maravelias's assent, to extend their deadline to reply to Mr. Maravelias's objections to their motions to dismiss until April 10, 2020. In support of this request, the defendants state as follows:

- 1. On March 6, 2020, the defendants, who are represented by separate counsel from the New Hampshire Attorney General's Office, each moved to dismiss Mr. Maravelias's complaint. ECF Doc. Nos. 19 & 20.
- 2. Mr. Maravelias filed separate objections to those motions on March 29, 2020. ECF Doc. Nos. 23 & 24.
- 3. Per Local Rule 7.1(e)(1), the defendants' deadline to reply to those objections is April 6, 2020.
 - 4. The defendants request that the Court extend this deadline until April 10, 2020.
- 5. The defendants request this extension due to the constraints on time and resources placed on defense counsel due to the COVID-19 pandemic.

6. Among other things, defense counsel are juggling modified work schedules, a

reallocation of resources within the Attorney General's Office, and the assumption of new

responsibilities in light of the state of emergency declared by Governor Sununu, which

necessitate the brief extension requested in this motion.

7. Defense counsel have contacted Mr. Maravelias, who assents to the relief

requested.

8. No separate memorandum of law is required in support of this motion, as all

relevant legal authority relied upon is cited herein. LR 7.1(a)(2).

WHEREFORE, the defendants jointly request, with Mr. Maravelias's assent, that this

Honorable Court:

A. Extend their deadline to reply to Mr. Maravelias's objections to their motion to

dismiss until April 10, 2020; and

B. Grant any such further relief as the Court deems just and proper.

Respectfully submitted,

GORDON J. MACDONALD, ATTORNEY GENERAL

By his attorney,

THE OFFICE OF THE ATTORNEY GENERAL

Dated: April 6, 2020 /s/ Samuel R.V. Garland

Samuel R.V. Garland, Bar #266273

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and

JUSTICES OF THE SUPREME COURT OF NEW HAMPSHIRE

By their attorney, GORDON J. MACDONALD ATTORNEY GENERAL

Date: April 6, 2020 /s/ Nancy J. Smith

Nancy J. Smith, NH Bar ID # 9085 Senior Assistant Attorney General New Hampshire Attorney General's Office 33 Capitol Street

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was sent by ECF on April 6, 2020 to all counsel and pro se parties of record.

/s/ Samuel R.V. Garland
Samuel R.V. Garland